

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

INTELLECTUAL VENTURES I LLC,
Plaintiff,
v.
SYMANTEC CORP.,
Defendant.

Case No. 10-cv-1067-LPS
JURY TRIAL DEMANDED

PLAINTIFF'S PROPOSED
VERDICT FORM

In answering these questions, you are to follow all of the instructions I have given you in the Court's charge.

Question No. 1 – '610 Patent Infringement

Has Intellectual Ventures proven by a preponderance of the evidence that Symantec infringes claim 7 of the '610 Patent?

Answer “yes” or “no.” _____

A “yes” answer is a finding for Intellectual Ventures. A “no” answer is a finding for Symantec.

Question No. 2 – '610 Patent Invalidity

Has Symantec proven by clear and convincing evidence that claim 7 of the '610 Patent is invalid?

Answer “yes” or “no.” _____

A “yes” answer is a finding for Symantec. A “no” answer is a finding for Intellectual Ventures.

Answer Question No. 3 if you answered “Yes” to Question No. 1 and “No” to Question No. 2.

Question No. 3 – '610 Patent Damages

What sum of money do you find from the preponderance of the evidence would fairly and reasonably compensate Intellectual Ventures for Symantec's infringement of the '610 Patent up to the time of trial?

Answer with the amount: \$ _____

Question No. 4 – '050 Patent Infringement

Has Intellectual Ventures proven by a preponderance of the evidence that Symantec infringes any asserted claim of the '050 Patent?

Answer “yes” or “no” for each claim.

A “yes” answer is a finding for Intellectual Ventures. A “no” answer is a finding for Symantec.

YES

NO

Claim 9: _____

Claim 16: _____

Claim 22: _____

Question No. 5 – '050 Patent Invalidity

Has Symantec proven by clear and convincing evidence that any of the asserted claims of the '050 Patent is invalid?

Answer “yes” or “no” for each claim.

A “yes” answer is a finding for Symantec. A “no” answer is a finding for Intellectual Ventures.

YES

NO

Claim 9: _____

Claim 16: _____

Claim 22: _____

Answer Question No. 6 if you answered “Yes” to Question No. 4 for any claim and “No” to Question No. 5 for that same claim.

Question No. 6 – '050 Patent Damages

What sum of money do you find from the preponderance of the evidence would fairly and reasonably compensate Intellectual Ventures for Symantec's infringement of the '050 Patent up to the time of trial?

Answer with the amount: \$

Question No. 7 – '142 Patent Infringement

Has Intellectual Ventures proven by a preponderance of the evidence that Symantec infringes any asserted claim of the '142 Patent?

Answer “yes” or “no” for each claim.

A “yes” answer is a finding for Intellectual Ventures. A “no” answer is a finding for Symantec.

YES **NO**

Claim 1:

Claim 7:

Claim 17:

Claim 21:

Claim 22:

Claim 24:

Claim 26:

Question No. 8 – ’142 Patent Invalidity

Has Symantec proven by clear and convincing evidence that any of the asserted claims of the ’142 Patent is invalid?

Answer “yes” or “no” for each claim.

A “yes” answer is a finding for Symantec. A “no” answer is a finding for Intellectual Ventures.

YES

NO

Claim 1: _____

Claim 7: _____

Claim 17: _____

Claim 21: _____

Claim 22: _____

Claim 24: _____

Claim 26: _____

Answer Question No. 9 if you answered “Yes” to Question No. 7 for any claim and “No” to Question No. 8 for that same claim.

Question No. 9 – ’142 Patent Damages

What sum of money do you find from the preponderance of the evidence would fairly and reasonably compensate Intellectual Ventures for Symantec’s infringement of the ’142 Patent up to the time of trial?

Answer with the amount: \$ _____

Date

Foreperson